

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

MICHAEL GROSS

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Plaintiff

*

v.

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Case No.: 1:17cv-00718-GLR

GARY BIRCHFIELD, et al.

*

Defendants

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**JOINT CONSENT MOTION TO EXTEND DEADLINES FOR DEFENDANTS' RULE
26(a)(2) DISCLOSURES AND FOR PLAINTIFF'S REBUTTAL RULE 26(a)(2)
DISCLOSURES**

Defendants, Gary Birchfield and Amhof Trucking, Inc., (hereinafter “Birchfield” and “Amhof”, respectively), and Plaintiff, Michael Gross, by their respective undersigned attorneys, and pursuant to this Honorable Court’s Orders dated March 20, 2017, and April 11, 2017, hereby respectfully request that the deadlines for Defendants’ Rule 26(a)(2) disclosures and Plaintiff’s Rule 26(a)(2) rebuttal disclosures be extended, and in support thereof states as follows:

1. The current deadline for Defendants’ Rule 26(a)(2) expert witness report disclosure is June 19, 2017. *See* ECF No. 7-1.

2. As discovery and investigation of the subject occurrence remains ongoing, Defendants are in need of additional time to identify their experts and to have expert reports produced pursuant to Rule 26(a)(2).

3. The undersigned counsel discussed the current disclosure deadlines and jointly consent and agree to the modification of the disclosure deadlines.

4. Defendants respectfully request, and Plaintiff consents to an extension of the deadline for Defendants’ Rule 26(a)(2) disclosures from June 19, 2017, to July 28, 2017.

5. In light of the extension for Defendants' Rule 26(a)(2) disclosures, Plaintiff hereby requests, and Defendants consent to the extension of the deadline for Plaintiff's Rule 26(a)(2) rebuttal disclosures from July 3, 2017, to September 1, 2017.

6. The extension of these deadlines will not affect the present deadline for completion of all discovery on September 15, 2017, and good cause exists for this request.

7. Neither this Honorable Court nor any of the parties to this case will be prejudiced by the present request.

WHEREFORE, the parties jointly request that the deadline for Defendants' Rule 26(a)(2) disclosures be extended to July 28, 2017, and that Plaintiff's deadline for rebuttal Rule 26(a)(2) disclosures be extended until September 1, 2017.

Respectfully submitted,

_____-s-_____
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 16th day of June, 2017, a copy of the foregoing
Answer was electronically served, and sent first class mail, postage pre-paid to:

Keith R. Siskind, Esq.
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-s-
Stephen J. Marshall